

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION**

In re:

**WILLIAM T. HARRIS & HEATHER M. HARRIS, Chapter 7
Debtors. Case No. 15-29085-L**

**MOTION TO SET ASIDE ORDER CLOSING CASE WITHOUT ENTRY OF A
DISCHARGE, OR IN THE ALTERNATIVE, MOTION TO REOPEN CHAPTER 7
BANKRUPTCY CASE FOR THE SOLE PURPOSE OF FILING THE FINANCIAL
MANAGEMENT COURSE CERTIFICATE AND REQUEST FOR AN EXPEDITED
HEARING**

COME NOW the debtors, by and through counsel, and move this Honorable Court to set aside prior order closing case without entry of a discharge, or in the alternative, to reopen their Chapter 7 Bankruptcy Case, to allow for the filing of personal financial management course statements; and in support of their Motion, the debtors would respectfully state unto this Honorable Court as follows:

1. That debtors' case was closed before the form(s) B-23 (financial management course) were filed; however, debtors have completed the process and acquired their certificate and the form(s) B-23 have been (or will be) filed.

WHEREFORE, premises considered, debtors pray:

1. That the Order Authorizing Bankruptcy Court Clerk to Close Case without Entry of a Discharge be set aside, or in the alternative, that Chapter 7 Bankruptcy case number 15-29085-L be reopened, for the sole purpose of filing the form(s) B-23 (Financial Management Certificate);
2. That, due to the financial situation of debtors and possible economic hardship upon debtors, any additional court costs/filing fees be waived in this matter;
3. That an **expedited hearing** be held regarding this motion; and,

4. For such further relief as this Court deems appropriate.

Respectfully submitted,

/s/ J. W. Vaughan, Jr. #15321

Attorney for Debtors
5104 Stage Road
Memphis, TN 38134
(901) 857-1558

CERTIFICATE OF SERVICE:

The undersigned hereby certifies that a true and correct copy of the foregoing will be duly served upon the following parties by regular U.S. mail, postage prepaid, the 4th day of May, 2016:

Interested parties.

/s/ J. W. Vaughan, Jr.